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Samsung Electronics America, Inc.

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

HMM CO., LTD.,

Plaintiff,

vs.

SAMSUNG ELECTRONICS  
AMERICA, INC.

Defendant.

Case No.: 8:24-cv-01454-FLA-ADS

Assigned to Hon. Fernando Aenlle-  
Rocha

**SAMSUNG ELECTRONICS  
AMERICA, INC.'S RESPONSE  
TO COURT'S ORDER TO SHOW  
CAUSE**

Complaint Filed: July 1, 2024  
Trial Date: None Set

1 Defendant Samsung Electronics America, Inc. (“SEA”) hereby responds to the  
2 Court’s Order to Show Cause Why the Action Should Not Be Transferred to a District  
3 Court in New York or New Jersey (“OSC”). *See* Dkt. No. 32.

4 SEA takes no position as to whether this matter should be transferred if Plaintiff  
5 fails to timely respond to the OSC. As the Court noted, “Plaintiff d[id] not plead any  
6 specific facts in the Complaint to establish that this is a more appropriate forum than a  
7 district court in New York or New Jersey.” It is Plaintiff’s burden, of course, to  
8 establish that venue is properly in California. *Synoptek, LLC v. Synaptek Corp.*, 326  
9 F. Supp. 3d 976, 986 (C.D. Cal. 2017) (“Once venue is challenged, the plaintiff bears  
10 the burden of showing that venue is proper.”) (citing *Piedmont Label Co. v. Sun*  
11 *Garden Packing Co.*, 598 F.2d 491, 496 (9th Cir. 1979)).

12 SEA does not know why Plaintiff chose to file this action in the Central District  
13 of California, when, admittedly, SEA is a New York corporation with its principal  
14 place of business in New Jersey, and where Plaintiff’s claims arise out of transactions  
15 discharged at various port facilities across the United States.

16  
17 Dated: January 31, 2025

HOLLAND & KNIGHT LLP

18  
19 /s/ Stacey H. Wang  
Stacey H. Wang

20 Attorneys for Defendant  
21 Samsung Electronics America, Inc.

22 **CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 11-6.1**

23 The undersigned, counsel of record for Samsung Electronics America, Inc.,  
24 certifies that this brief contains 201 words, which complies with the word limit of  
25 L.R. 11-6.1.

26 DATED: January 31, 2025

By: /s/ Stacey H. Wang  
Stacey H. Wang